



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EAG/JDG/CMP
F.#2008R00530

271 Cadman Plaza East
Brooklyn, New York 11201

November 8, 2011

By Federal Express

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Re: United States v. Thomas Gioeli, et al.
Criminal Docket No. 08-240 (BMC)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following enclosed additional discovery in the above-captioned case. The government also renews its request for reciprocal discovery.

<u>EXHIBITS</u>	<u>DESCRIPTION</u>
1323	Digital video disc ("DVD") containing a surveillance video recording of Thomas Gioeli and others recorded on November 29, 2004
1324	DVD containing surveillance video recordings of Thomas Gioeli, Dino Calabro and others recorded on January 22 and January 24, 2001

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<u>EXHIBITS</u>	<u>DESCRIPTION</u>
1325-1328	Documents obtained during a search of a residence of Alphonse Persico on October 8, 1999
1329	Verizon records regarding a pay telephone with telephone number (718) 232-9566
1330	Compact disc ("CD") containing copies of photographs taken by the Office of the Chief Medical Examiner, City of New York ("NY OCME") in connection with the autopsy of Francesco Marasa
1331	CD containing copies of photographs taken by NY OCME in connection with the autopsy of Joseph Miccio
1332	CD containing copies of photographs taken by NY OCME in connection with the autopsy of Ralph Dols
1333	CD containing copies of photographs of Thomas Gioeli, Dino Calabro and others
1334	CD containing transcripts of the 2006 trial in <u>United States v. Alphonse Persico and John DeRoss</u> , 04 CR 911 (SJ)
1335	Records from Kings County Supreme Court regarding <u>Richard Greaves v. The City of New York</u> , Index No. 14833/91

In addition, the government is in possession of copies of X-ray images taken by the NY OCME in connection with the autopsies of Awjad Ennab, Francesco Marasa, Joseph Miccio and Ralph Dols. Should you wish to arrange a time to inspect these materials, please contact us.

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If you have any questions or requests, please contact us.

Sincerely,

LORETTA E. LYNCH
United States Attorney

By: /s/James D. Gatta
Elizabeth A. Geddes
James D. Gatta
Cristina M. Posa
Assistant U.S. Attorneys

cc: Carl J. Herman, Esq. (by ECF) (w/o enclosures)
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